

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO**

MELODY JOY CANTU AND DR. RODRIGO
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

Fourth Continuance Request On Consent Of All Parties

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu in their fourth continuance request, and Co-Defendants Dr. Sandra Guerra and Digital Forensics Corporation, LLC, through their undersigned attorneys, hereby stipulate:

1. The last filed motion in this matter is Plaintiffs' Reply in Support of Their Motion to Dismiss Dr. Sandra Guerra's Amended Counterclaims.
2. The parties are currently going through discovery. The ADR Report has been filed on March 15, 2021 (Docket. No. 44). On June 16, 2021, expert designations are due.
3. On January 30, 2021 Plaintiff Melody Joy Cantu had a medical emergency, she was thrown off a horse. Mrs. Cantu is still dealing with pain management and recovery these past few months. She continues to be in immense pain and repeatedly visits doctors and the hospital to deal with issues stemming from the event.
4. Plaintiffs and Dr. Guerra are communicating with the intent to partake in mediation. Parties plan to use the continuance to choose a date for mediation and begin the processes of mediation.
5. Plaintiffs' counsel reached out to opposing counsel for both Co-Defendants and had a good faith conference regarding their request for a continuance. All parties are in agreement to a 60-day continuance. After which, they will reconvene to review whether another continuance is necessary.
6. All parties are in agreement and stipulate to a sixty-day continuance of our discovery deadlines. With the new deadlines as follows:
 - August 16, 2021: Designation of Experts by Parties Asserting Claims
 - August 30, 2021: Responses to Settlement Offers from Opposing Parties

- September 14, 2021: Last day to Amend/Supplement Pleadings, and Joinder
- October 1, 2021: Designation of Experts by Parties Resisting Claims
- November 15, 2021: Discovery Deadline
- November 29, 2021: Joint Report on Settlement Negotiations
- December 13, 2021: Last Day to File Dispositive Motions

Dated: June 15, 2021

Stipulated and respectfully submitted,

/s/ Tor Ekeland

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Dr. Rodrigo Cantu*

Certificate of Service

I certify that on this 15th of June 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Tor Ekeland